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May 24, 2022

VIA ECF

Honorable Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Kellner v. City of New York, et al.
Docket No. 17-cv-01268 (MKB) (MMH)**

Dear Judge Henry:

I represent Plaintiff in the above matter and submit this joint status report, on behalf of the parties, pursuant to the Court's Order dated April 22, 2022.

Further to the parties' prior status report, the non-party depositions for which dates had been confirmed have been completed, except for the deposition of ADA O'Donnell. On the eve of his deposition, the parties were informed by the Kings County District Attorney's office ("KCDA") that it had located approximately 500 pages of additional discovery. Following review of the production, Plaintiff's counsel believes that further documents are still outstanding. The parties proceeded nonetheless with the deposition, subject to the KCDA's agreement to produce ADA O'Donnell on another date to complete it once the remaining documents have been produced. Otherwise, Plaintiff expects to resume non-party depositions on June 21, 2013, once Plaintiff's counsel returns from his overseas trip. Defendants will also be conducting depositions in late June or July. Defendants reserve their right to object to the length and the numbers of depositions conducted by Plaintiff. Finally, Plaintiff served a written settlement demand today in accordance with the Court's Order.

The parties thank the Court for its attention to this matter.

Respectfully,

Niall MacGiollabhuí
Niall MacGiollabhuí

cc: Susan P. Scharfstein, Esq.